

4.0 OTHER CEQA SECTIONS

This section presents the evaluation of additional environmental impacts analyses required by the California Environmental Quality Act (CEQA) that are not covered within the other sections of this Environmental Impact Report (EIR), including significant unavoidable environmental effects of the project, irreversible environmental changes, growth inducing impacts (including removal of obstacles to growth), and resource areas that are found not to be significant. In particular, Section 15126 of the CEQA Guidelines requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. Accordingly, in addition to the analysis provided in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, this EIR must identify growth inducing impacts and significant irreversible environmental changes that would potentially result from implementation of the proposed Avila Ranch Development Project (Project).

4.1 IRREVERSIBLE ENVIRONMENTAL IMPACTS

CEQA Guidelines, Section 15126.2(c) requires that irreplaceable commitments of resources be evaluated to assure that such current consumption is justified. This includes use of nonrenewable resources, the commitment of future generations to similar uses, and irreversible damage which can result from environmental accidents associated with the Project.

Construction of new buildings and paved surfaces would involve consumption of building materials and energy, some of which are nonrenewable or locally limited natural resources (e.g., fossil fuels and wood). Nonrenewable resources utilized for the proposed Project could no longer be utilized for other purposes. Consumption of building materials and energy is associated with any development in the region, and these commitments of resources are not unique or unusual to the proposed Project. The proposed Project would represent an incremental commitment to long-term use of nonrenewable resources, particularly gasoline for substantially increased automobile use and oil, coal, and natural gas for power generation. Although not unique to the proposed Project, the auto-oriented nature of the proposed Project would result in it being one of the larger energy consuming developments, particularly for gasoline, of those recently considered by the City of San Luis Obispo (City). In addition, as discussed in Section 3.3, *Air Quality and Greenhouse Gas Emissions*, use of each of these forms of non-renewable energy would contribute to the generation of greenhouse gases (GHGs) with an incremental contribution to global climate change. To help alleviate impacts to non-renewable resources, the Project would

be compliant with the U.S. Green Building Council's Leadership in Energy and Environmental Design for Neighborhood Development ("LEED-ND") "silver" certification and San Luis Obispo County's (County's) Green Build "emerald" certification rating. Moreover, the Project is proposed to include photovoltaic solar panels on at least 50 percent of residential units. These sustainable building features could reduce new energy demand and the consumption of water and non-renewable fossil fuels. Consumption of these resources would occur with any development in the region and are not unique to the proposed Project.

As described in Section 3.2, *Agricultural Resources*, implementation of the proposed Project would irreversibly commit 71 acres of prime farmland soils from active agricultural production to residential development. The proposed Project would commit future generations to similar uses. The irretrievable commitment of this site for these uses is mitigated with permanent protection of offsite agricultural lands of equal area and quality by purchasing a parcel of at least 71 acres of equal quality farmland to be put into an agricultural conservation easement via mitigation MM AG-1. Further, the Project would provide local provisions and services to Project residents through the establishment of a 15,000 square feet (sf) Town Center consisting of Neighborhood Commercial uses (i.e., shopping, offices, and convenience stores).

The proposed Project would not be expected to result in environmental accidents that have the potential to cause irreversible damage to the natural or human environment.

4.2 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires a discussion of how the proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Induced growth is distinguished from the direct economic, population, or housing growth of a project. Induced growth is any growth that results from new development that would not have taken place in the absence of the project and that exceeds planned growth. CEQA Guidelines also state that growth in any area should not be assumed to be necessarily beneficial, detrimental, or of little significance to the environment.

Growth-inducing impacts are caused by those characteristics of a project that tend to foster or encourage population and/or economic growth. Inducements to growth include the generation of construction and permanent employment opportunities in the support sectors of the economy. The proposed Project could result in four types of growth-inducing

impacts: 1) the creation of short- and long-term employment opportunities which draw newcomers to the region; 2) the associated increase in housing demand; 3) the generation of new commercial and tourist accommodations to entice people to the area; and 4) expansion of utilities and infrastructure.

As discussed in Section 3.10, *Population and Housing*, the proposed Project would construct 720 housing units and provide approximately 27 long-term jobs, in addition to short-term construction employment. Subsequently, with only 27 long-term jobs, there would be a very minor influx of growth inducement from long-term employment opportunities, if any growth at all, considering the probability of these 27 long-term jobs being absorbed by existing residents or future residents of the Project. The construction of 720 new units would result in a residential population growth of approximately 1,649 persons. However, construction of 720 housing units would alleviate the City's increased housing demand, and is thus not considered growth-inducing. Population growth within the City is directly related to the increase in available housing supply, and the City's Land Use Element Policy LU 1.11.2 allows for an increase in housing units up to one percent annually, excluding affordable housing.

Further, as a result of an influx of 1,649 people to the City population, secondary impacts would likely occur due to increased commuter traffic and associated air quality impacts, particularly generation of GHGs.

As discussed in Section 3.13, *Utilities*, the proposed Project would construct water supply and wastewater collection systems for the Project site that would tie into City systems. Extension of the Earthwood Lane water line would eventually become a looping system that would contain a stubbed water main along Buckley Road to enable future eastern connections. Contrarily, the adjacent future development at Vachell Lane was planned to be served by septic systems when initially approved by the County. Revisions to that system and extension of sewer mains to this area are not a part of proposed improvements associated with the Project.

Extensions of road infrastructure resulting from the Buckley Road Extension, Horizon Lane Extension, and Earthwood Extension could also be potentially growth inducing, as they would facilitate improved access and circulation within the vicinity. In particular, roadway and utility extensions could facilitate the development of two currently undeveloped and used for agriculture parcels zoned M-1, Industrial, to the west of the Project site along Vachell Lane. Areas to the northwest of the Project site would be the first to experience growth due to the improved access and circulation brought about by the

Project; these parcels are currently used for agriculture but are zoned for industrial land uses. The Project may also induce growth by encouraging development toward the southern end of the City, and developing more intensive land uses within this area. This could have the effect of putting pressure on the County to encourage additional growth south of the City.

4.3 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines state that the EIR shall contain a statement briefly indicating the reasons that various potentially significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR (Section 15128). After standard regulatory conditions and/or mitigation measures are applied, several resource areas were found to be below a level of significance, as identified in the Initial Study Checklist (Appendix A). Some of these issues have been reassessed in this EIR, and further analysis resulted in mitigation measures provided as appropriate. Results of the environmental analyses are either presented in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, or discussed below.

4.3.1 Geological Resources

With regard to the proposed Project, geological resources were identified on the Initial Study Checklist as having *potentially significant* impacts unless mitigation measures are incorporated. No known fault lines are located on or in the immediate vicinity of the Project site. However, the Project is located within a seismically active region of the state of California, and strong ground shaking should be expected during the life of the proposed Project. As a result, structures have been engineered to withstand significant seismic activity, and impacts associated with potential seismic activity are expected to be *less than significant*.

Mitigation measures identified in the Initial Study to reduce potentially significant impacts related to geological resources are listed below.

MM GEO-1. Design and construction of the buildings, roadway infrastructure and all subgrades shall be engineered to withstand the expected ground acceleration that may occur at the Project site. The design shall take into consideration the soil type, potential for liquefaction, and the most current and applicable seismic attenuation methods that are available. All onsite structures shall comply with applicable provisions of the 2010 California

Building Code (CBC), local codes, and the most recent California Department of Transportation seismic design standards.

MM GEO-2. For commercial retail stores included in the Project, goods for sale may be stacked no higher than 8 feet from the floor in any area where customers are present, unless provisions are made to prevent the goods from falling during an earthquake of up to 7.5 magnitude. The stacking or restraint methods shall be reviewed and approved by the City before approval of occupancy permits, and shall be a standing condition of occupancy.

MM GEO-3. A geotechnical study shall be prepared for the Project site prior to site development. This report shall include an analysis of the liquefaction potential of the underlying materials according to the most current liquefaction analysis procedures. If the Project site is confirmed to be in an area prone to seismically-induced liquefaction, appropriate techniques to minimize liquefaction potential shall be prescribed and implemented. All onsite structures, transportation infrastructure, and subgrades shall comply with applicable methods of State and Local Building Codes and all transportation infrastructure shall comply with the most current California Department of Transportation design standards. Suitable measures to reduce liquefaction impacts could include one or more of the following techniques, as determined by a registered geotechnical engineer:

- Specialized design of foundations by a structural engineer;*
- Removal or treatment of liquefiable soils to reduce the potential for liquefaction;*
- Drainage to lower the groundwater table to below the level of liquefiable soil;*
- In-situ densification of soils or other alterations to the ground characteristics; or*
- Other alterations to the ground characteristics.*

MM GEO-4. The Site Geotechnical Investigation shall include an evaluation of the potential for soil settlement beneath the Project site. If the Project site is identified to be in a high potential for settlement zone based on the Site Geotechnical Investigation, the building foundations, transportation

infrastructure, and subgrades shall be designed by a structural engineer to withstand the existing conditions, or the site shall be graded in such a manner as to address the conditions. Suitable measures to reduce settlement impacts could include one or more of the following techniques, as determined by a qualified geotechnical engineer:

- *Excavation and recompaction of onsite or imported soils;*
- *Treatment of existing soils by mixing a chemical grout into the soils prior to recompaction; or*

Foundation design that can accommodate certain amounts of differential settlement such as post tensional slab and/or ribbed foundations designed in accordance with the CBC.

MM GEO-5. The Site Geotechnical Investigation shall include an evaluation of the potential for soil expansion beneath the Project site. If the Project site is identified to be in a high expansive soil zone based on the Site Geotechnical Investigation, the foundations and transportation infrastructure shall be designed by a structural engineer to withstand the existing conditions, or the site shall be graded in such a manner as to address the conditions. Suitable measures to reduce impacts from expansive soils could include one or more of the following techniques, as determined by a qualified geotechnical engineer:

- *Excavation of existing soils and importation of non-expansive soils; and*

Foundation design to accommodate certain amounts of differential expansion such as post tensional slab and/or ribbed foundations designed in accordance with the CBC.

MM GEO-6. The Site Geotechnical Investigation shall include soil parameter analyses to determine the potential for subsidence at the Project site. If the potential for subsidence is found to be significant, then structural and grading engineering measures shall be implemented to incorporate the results of the geotechnical study. These measures would be similar to those recommended to mitigate impacts to soil settlement.

MM GEO-7. During drought periods, groundwater pumping limitations for the unconsolidated aquifer underlying the Project site shall be assessed and implemented to prevent soil subsidence.

According to the soils map shown in Section 4.2 of the Land Use and Circulation Elements Update EIR (LUCE Update EIR), the Project site contains soils with moderate shrink-swell potential and high erosion potential. Therefore, development in these areas could occur on soils that have the potential to present hazards related to differential settlement, expansive soils, and erosion. However, new development would conform to the CBC. Proper engineering, including compliance with the CBC, the City of San Luis Obispo Municipal Code, and General Plan policies would reduce program level impacts from expansive soils, erosive soils, and differential settlement to *significant but mitigable*.

4.3.2 Mineral and Forestry Resources

No known mineral or forestry resources are associated with the Project site; therefore, *no impact* to mineral or forestry resources are expected from the proposed Project.

4.4 UNAVOIDABLE SIGNIFICANT ENVIRONMENTAL EFFECTS

CEQA Guidelines, Section 15126.2(b) requires a description of any significant impacts resulting from implementation of a project, including impacts that cannot be mitigated to below a level of significance. The proposed Project was evaluated with respect to specific resource areas to determine whether implementation would result in significant adverse impacts. A detailed discussion of each of the impacts can be found in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*.

Specific significance thresholds were defined for each potential impact associated with each resource area. Based on the environmental impact assessment presented in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, of this EIR, the resource areas of aesthetics and visual resources, air quality and GHGs, agricultural resources, biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, noise, public services, transportation and traffic, and utilities would result in some form of significant impact. Mitigation measures were developed that would reduce impacts to below a level of significance. However, the following impacts cannot be mitigated below a level of significance:

- Construction and long-term air pollutant emissions that exceed the County of San Luis Obispo Air Pollution Control District (APCD) standards;

- Air quality impact inconsistency with the County of San Luis Obispo APCD's 2001 Clean Air Plan;
- Potential inconsistency with several adopted City policies in the General Plan, including biological resources protection, agricultural resources preservation, and provision of utilities and public services.
- Temporary exceedance of City noise standards during grading and site preparation construction activities;
- Intersection operations impacts to the Buckley Road/State Route (SR) 277 intersection; and
- Cumulatively considerable contribution to significant impacts to the operational conditions at the intersection of Prado Road/South Higuera Street.

Under CEQA Guidelines Section 15065, when an EIR demonstrates that implementation of a proposed project will cause significant and unavoidable impacts, the agency must issue a Statement of Overriding Considerations before approving the project. A Statement of Overriding Considerations is a report of the lead agency's findings regarding the merits of approving a proposed project despite its environmental impacts, and reflects the balancing of competing public objectives. Therefore, the City of San Luis Obispo will be required to adopt a Statement of Overriding Considerations to address the significant impacts listed above. In this instance, the City may weigh the long-term benefits of the Project, such as fostering additional regional housing opportunities, in light of the potentially adverse air quality created by such a project. To facilitate consideration of these issues, this EIR discloses potential impacts and also provides a range of Project alternatives which could more fully alleviate environmental concerns. In addition, Section 3.8, *Land Use and Planning*, provides an overview of the City's policy context, which provides information on how the Project meets a number of important City policy objectives and where it may raise concerns over consistency with other City policies. All of this information should be reviewed when considering this Project.